

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHAD ANDREW THORNE,

Defendant.

**CRIMINAL COMPLAINT
MJ 22-³⁴-M-KLD**

WIRE FRAUD

Title 18 U.S.C. § 1343

(Count 1)

**(Penalty: 20 years of imprisonment,
\$250,000 fine, and three years of
supervised release)**

BANK FRAUD

(Count 2)

Title 18 U.S.C. § 1344

**(Penalty: 30 years imprisonment,
\$1,000,000 fine, and five years
supervised release)**

AGGRAVATED IDENTITY

THEFT (Count 3)

Title 18 U.S.C. § 1028A(a)(1)

**(Penalty: Two years imprisonment in
addition to punishment for
underlying felony, \$250,000 fine, and
one year supervised release)**

CONSPIRACY TO POSSESS

WITH THE INTENT TO

DISTRIBUTE CONTROLLED

SUBSTANCES

Title 21 U.S.C. § 846

(Count 4)

**(Penalty: 20 years of imprisonment,
\$1,000,000 fine, and at least three
years supervised release)**

**POSSESSION WITH INTENT TO
DISTRIBUTE CONTROLLED
SUBSTANCES**

**Title 21 U.S.C. § 841(a)(1) and
18 U.S.C. § 2**

(Count 5)

**(Penalty: 20 years of imprisonment,
\$1,000,000 fine, and at least three
years supervised release)**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

The undersigned, Trevor Hare, affiant being duly sworn states:

1. I am a Special Agent with the Federal Bureau of Investigation and am currently assigned to the Kalispell Resident Agency in Kalispell, Montana. I have been employed as an agent for seven years and in that time have had extensive training and experience in conducting violent crime investigations. Since reporting to Kalispell in March 2020, I have been a member of the FBI's Montana Regional Violent Crime Task Force, which specializes in targeting habitual violent offenders, dismantling violent criminal enterprises, and tracking fugitives. From 2015 to 2020, I was assigned to the Lewiston Resident Agency in Lewiston, Idaho, where I conducted federal investigations, including homicide, kidnapping, assault, assault on a federal officer, firearms offenses, sexual assault, child abuse, strangulation, narcotics offenses, and financial crimes. Prior to joining the FBI, I served as a Maritime Law Enforcement Boarding Officer for the United States Coast Guard. As a Maritime Law Enforcement Boarding Officer, I enforced U.S.

and international law on the high seas and waters subject to the jurisdiction of the United States, including Bilateral Maritime Counter-Drug Agreements.

2. On January 15, 2021, Flathead County Sheriff's Office Deputy McGauley was dispatched to the Shamrock Casino at 1254 East Hwy 2 in Kalispell, Montana, to a report of fraud. A Shamrock Casino employee, Elaine Berg, stated that on December 27, 2020, a person believed to be Chad Thorne cashed a check for \$25.00 at the casino. On January 12, 2021, Glacier Bank called Berg and told her the check appeared to be fictitious and that the routing number from the check was not linked to an account belonging to Chad Thorne.

3. On January 27, 2021, Flathead County Sheriff's Office Deputy Mulcahy responded to a report of forged checks at 122 Westwood Lane, Kalispell, Montana. Upon arrival, Robert Koehler stated he observed two strange charges on his checking account with Glacier Bank. Glacier Bank told Koehler that the first check was written to Super 1 in the amount of \$57.07 and the second check was written to Home Depot in the amount of \$175.30. Koehler collected copies of the two checks from Glacier Bank and saw the checks were drawn from his account number, but the checks were from "Chad Thorne." Additionally, Koehler noticed the check numbers were 1780 and 1781, which were approximately 1600 numbers off from the check numbers in the checkbook he was currently using. Koehler said the last check he wrote was to Lillienthal Insulation. Deputy Mulcahy contacted

Lillienthal Insulation and attempted to speak with Thorne. The employee on site confirmed that Thorne was an employee with them but said he was at a jobsite. Deputy Mulcahy left his business card but has been unable to interview Thorne.

4. On February 4, 2021, Kalispell Police Department received a report of check fraud from Amelia Gonzalez with Express Employment Professionals. Gonzalez stated Whitefish Credit Union notified Express Employment of three fraudulent checks processed under the Express Employment account. Whitefish Credit Union provided Gonzalez with a copy of the checks, which were all made out to Chad Thorne, who had recently notified Express Employment that he was terminating his job with them. Gonzalez advised Express Employment did not issue the checks to Thorne, nor did they authorize payment to him. Further, the signature on the fraudulent checks was not the Express Employment authorized signature for expenditures. The check amounts were for the following amounts: \$882.77, \$766.32, and \$588.42. On February 26, 2021, Gonzalez emailed Kalispell Police Department Detective Williams a copy of another alleged fraudulent check that was cashed at Park Side Federal Credit Union. This check was drawn from Express Employment's account to Kristina Ferree in the amount of \$832.00. Gonzalez told Detective Williams that the signature on the check matched the signature on the other checks fraudulently cashed by Thorne. The listed address on the checks was 47 Meadowlark Drive, Kalispell, Montana.

Additionally, Gonzalez told Detective Williams that Ferree never worked for Express Employment.

5. On March 5, 2021, the Flathead County Sheriff's Office received a tip that drug activity was occurring at 47 Meadowlark Drive in Kalispell, Montana. The tip identified that people at the residence were participating in the sale of dangerous drugs and that the shed in the back of the residence was occupied. This tip was given to Deputy Vanderark, who performed additional patrols around this residence and, at one point, observed Thorne outside the residence. Deputy Vanderark was aware that Thorne was on probation and known to use drugs.

6. On March 12, 2021, Kalispell Police Department Officer Willey took a report from Park Side Credit Union regarding the receipt of four fictitious checks deposited into their interactive teller machines by Kristina Ferree. The checks were deposited by Kristina Ferree into three different machines between February 3, 2021, and February 4, 2021. The checks were paid to Kristina Ferree from various businesses, including Bear Paw Credit Union in the amount of \$890.88, Aqua Bounty in the amount of \$635.00, Aqua Bounty in the amount of \$740.02, and Express Employment in the amount of \$882.77. The Express Employment check is the same amount and number as the check deposited by Chad Thorne from Express Employment and listed above.

7. On March 17, 2021, Deputy Vanderark drove by 47 Meadowlark Drive and observed Rachelle Afseth, who was known to be on probation and a drug user, walk toward the backyard. Shortly thereafter, Deputy Vanderark saw Chris Lease, who had a felony warrant, pull into 47 Meadowlark Drive. Lease was driving a blue Chevrolet Cruze with a license plate that returned to Natalie Rich. Deputy Vanderark was aware that Rich and Lease were in a relationship and that Rich was on probation. Deputy Vanderark requested backup in order to arrest Lease. Officers knocked on the door to the residence and on the shed in the backyard. No one came to the door of the main residence. Officers at the shed contacted Thorne and observed Afseth inside the shed. Thorne confirmed that Lease and Rich were in the main residence. Lease refused to exit the residence. Deputies requested Probation and Parole respond to the residence to assist with supervision of the three probationers while they executed the arrest of Lease. Probation and Parole Officers Moe and Dargan responded. Officer Moe advised he had placed a probation violation warrant on Thorne. Based on the probationers living with Lease, a fugitive, the probation violation warrant issued for Thorne, and the suspicious manner in which probationer Afseth quickly threw a blanket over items in the shed when contacted by officers, Officers Moe and Dargan decided to conduct a probation search. During the search, officers collected and seized three jewel bags of methamphetamine, multiple items of drug paraphernalia, and three

printed checks: Pearl Brewery LLC in the amount of \$2,550.00 to Chad Thorne, Alliance Credit Union in the amount of \$2,450.55 to Chad Thorne, and Greenlight LLC in the amount of \$912.00 to Brazil Avilla. Chris Lease was arrested on his felony warrant. Upon transport to the Flathead County Detention Center, Deputy Vanderark located a check inside Chris Lease's wallet from TPG in the amount of \$892.25. Chris Lease stated Chad Thorne gave him the check.

8. On March 18, 2021, Flathead County Sheriff's Deputy Brauer responded to a suspicious activity complaint at 47 Meadowlark Drive. While doing so, Deputy Brauer saw Brazil Avilla, who was in a white Subaru belonging to Chad Thorne. Deputy Brauer was aware that Avilla was on probation and contacted her probation officer, Shelly Dargan. Dargan requested Deputy Brauer conduct a search of Avilla's vehicle and seize a printer from the vehicle. As Avilla exited the vehicle, Brauer directed her to empty her pockets. As she did, she attempted to conceal a jewel bag, which is commonly used to carry illegal drugs. Avilla told Deputy Brauer that she was trying to help Thorne. During the search of the vehicle, deputies located a computer and printer believed to have printed checks seized the previous day. Deputies also found two checks in the vehicle—one from TPG in the amount of \$374.90 paid to Chad Thorne and from Tamarack Brewing Company in the amount of \$834.90 paid to Raychelle Afseth. The Tamarack Brewing Company check was endorsed by Raychelle with the last name

being illegible. With the unique spelling of Raychelle, the illegible name is suspected to be Raychelle Afseth. Tamarack Brewing Company did not have any fraudulent charges, and it does not appear that any of the checks were cashed. Deputy Vanderark located a check from Express Employment in the amount of \$424.33 in Brazil Avilla's wallet, which was not endorsed.

9. On March 22, 2021, Polson Police Department Officer Matt Woods responded to a fraud complaint at the Super 1 Grocery Store at 50331 U.S. Highway 93 in Polson, Montana. Upon arrival at the store, Officer Woods met with the store manager, Gary Collinge. Collinge stated Super 1 cashed two fraudulent checks, written out to Chad Thorne and Christopher Lease. Collinge showed Officer Woods store security video in which a man matching the driver's license photograph of Christopher Lease cashed a check from Tamarack Brewing in the amount of \$455.23. Collinge also showed a store security video in which a man matching the driver's license photograph of Chad Thorne cashed a check from Express Employment Professionals in the amount of \$474.33. The store security video depicted the two men exiting the store separately and getting into the same white Subaru Outback. Upon receipt of this report, I queried FBI open source databases and observed that Thorne has a historical ownership record for a 2002 white Subaru Legacy. A side-by-side review of a Subaru Legacy and a Subaru

Outback indicates the two vehicle models are very similar but that the Outback sits higher off the ground.

10. On April 7, 2021, Flathead County Sheriff's Office Detective McConnell listened to jail calls from Thorne's account at the jail. One particular call was between Thorne and a female believed to be Avilla. Avilla and Thorne discussed a computer and a printer. Thorne directed Avilla to go the Sheriff's Office and demand return of the computer and printer, saying they belonged to her. During another phone call, Thorne told Avilla there was no law prohibiting the writing of checks if they were not cashed. Detective McConnell also listened to recorded phone calls between Thorne and a female believed to be Crystal Stierns. Thorne and Stierns discussed Thorne's computer and printer being seized when Avilla was driving Thorne's vehicle.

11. On May 26, 2021, Columbia Falls Police Department received a report of a forged check. A check from Great Northern Assisted Living paid to Chad Thorne in the amount of \$623.88 was deposited via mobile to One Finance Inc. in Sacramento, California. Flathead County Sheriff's Office Deputy Perry picked up a copy of the forged check and a statement from Chris Wiebelhouse, who said the check was fraudulent. Deputy Perry contacted Weibelhouse, who advised he did not know Thorne and that the bank had already reimbursed him for his loss.

12. On June 24, 2021, Flathead County Sheriff's Office Detective McConnell interviewed a confidential witness (CW1). CW1 had a criminal history, including drug offenses. CW1 stated Thorne gave CW1 a check and that CW1 was aware of the computer and printer Thorne possessed. CW1 said Thorne printed checks and gave them to people to cash and that Thorne would get 20% of the cash received. CW1 stated Thorne wanted people to tell law enforcement the printer and computer they seized did not belong to him. CW1 was aware that Thorne was the one printing checks. CW1 overheard Thorne and Lease talking about "percentage" and accomplishing things regarding the checks quickly.

13. On December 19, 2021, Flathead County Sheriff's Officers were dispatched to 47 Meadowlark Drive to a reported domestic violence incident in the "garage" behind the house between Chad Thorne and his girlfriend, Kristal Jelley. Upon arrival, Deputy Veneman stopped the assault in progress. Jelley told officers that Thorne hit her in the face and pulled her hair. Deputy Veneman observed Jelley had a rag over her nose and there was blood on the floor. Thorne was taken into custody.

14. On May 16, 2022, Brian Kahler, owner of the business Brian's 76 Inc., reported multiple people cashing forged checks in his name. Flathead County Sheriff's Office Deputy Rowell contacted Kahler by phone, and Kahler stated the following checks were fraudulent:

- A check for \$1,329.30 was cashed to Jason Finkenbiner on April 27, 2022;
- A check for \$796.22 was cashed to Richie Probert on April 29, 2022;
- A check for \$836.17 was cashed to Gracelynn Romine on April 29, 2022; and,
- A check for \$126.84 was cashed to Crystal Stierns on May 11, 2022.

Detective Mulcahy subsequently learned from Kahler that Stierns previously worked for him but quit after approximately two months.

15. On June 6, 2022, Detective McConnell interviewed a confidential witness (CW2). CW2 did not have a criminal history. CW2 stated Chad Thorne gave CW2 two checks, neither of which belonged to Thorne. CW2 said Thorne stole checks from mailboxes and also printed checks from his home computer.

16. On June 7, 2022, Detective McConnell executed a search warrant on a 2010 Dodge Ram pickup, driven by Crystal Stierns when she was arrested with a stolen trailer earlier in the week. During the execution of the search warrant, officers seized a small amount of suspected methamphetamine, four blank checks from the account of Brittany Hostutler, a check from Brittany Hostutler written out to Crystal Stierns, a check from Global One LLC to Crystal Curtis in the amount of

\$1,267.54, and a notebook containing the names, dates of birth, social security numbers, and drivers' license numbers of various individuals.

17. On June 23, 2022, Detective McConnell and Detective Mulcahy spoke with a confidential witness (CW3). CW3 had a criminal history, including theft. CW3 stated Josh Bland requested CW3 cash a Pacific Steel payroll check. Bland said CW3 would get \$100 of the check proceeds. CW3 later found out that Thorne had provided Bland the check and advised that Bland recruited people to cash checks for Thorne. CW3 bought methamphetamine from Thorne and knew Thorne provided Melanie Hickok a \$3,000 check from Holmquist Solutions in approximately March 2022. CW3 was aware that Thorne stole account and routing numbers from mailboxes and also had other people steal them for him.

18. On June 28, 2022, I conducted physical surveillance at 47 Meadowlark Drive, Kalispell, Montana, 59901, with Task Force Officer Shane Lidstrom. Lidstrom and I observed a red Lincoln LS sedan with Montana license plate 7-556948D, which returned to Chris Lease and Natalie Rich. Additionally, Task Force Officer Lidstrom and I observed a white Jeep pickup and a burgundy sports utility vehicle with a temporary plate, which I was unable to read. An apparent security camera was photographed above the front door to the residence.

19. On June 29, 2022, FBI Task Force Officer Jody McLeod and I interviewed a confidential witness (CW4). CW4 had a criminal history, including drug and theft offenses. CW4 reported observing Thorne printing fake payroll checks off his laptop and printer/scanner in approximately 2015 and was aware Thorne had made fraudulent checks since that time. Thorne told CW4 how he used a program on his computer to make the fraudulent checks and how he would generate random bank account numbers and attempt to use them. Thorne used a particular ink utilized in checks and this would ensure the checks were not flagged as fraudulent. Thorne preferred to send other people to grocery stores to cash the checks because such establishments had less scrutiny than banks. Thorne would allow co-conspirators to keep some of the cash from checks they cashed, but Thorne required them to give the majority of the proceeds back to him. Thorne kept most of his check amounts between \$600 and \$1,500 so that he could tell people they would not get a felony if they cashed a check for him. Thorne bought his payroll checks from Staples or Office Max. CW4 gave someone a ride to meet with Thorne where he lived on Meadowlark Drive in approximately March 2022. CW4 was aware that Thorne and his girlfriend were living in a shed behind the property and that another couple was living in the main residence. CW4 stated the residence occasionally served as a “flop house” where drug users congregated and drug transactions occurred. CW4 purchased one “eight-ball” of

methamphetamine from Thorne for \$200 in February 2022. CW4 observed the computer program on Thorne's laptop that generated financial account numbers, which allowed the checks to be cashed by co-conspirators without being flagged as fraudulent. CW4 took one of Thorne's co-conspirators to Smith's grocery store to cash a fraudulent check. Thorne's residence most likely had more than one pistol to help collect funds from people they sent to cash checks. CW4 advised there was a pit bull at Thorne's residence as well.

20. On June 29, 2022, I checked two separate FBI open-source databases for Thorne's reported address. Both databases listed Thorne's address as 47 Meadowlark Drive, Kalispell, Montana. The investigation has uncovered that various banks involved were FDIC insured, and the cashing of the fraudulent checks generated interstate wires.

21. On July 1, 2022, Kalispell Police Department Officer Vukonich conducted a traffic stop on a silver Audi SUV with temporary plate AALS1743 because the plate returned inactive and the inactive plate was a traffic violation. The driver identified himself as Chad Thorne and showed Officer Vukonich a photo of his Montana driver's license on his cell phone. Thorne stated the vehicle belonged to him. Officer Vukonich identified passengers Melissa Kirkland and Chase Newell based on numerous prior contacts. All three occupants of the vehicle had warrants for their arrest. Thorne provided consent to search the

vehicle. A black zippered pouch in the front passenger door panel was collected and found to contain a round blue pill with an “M” on one side and a “30” on the other. This pouch was seized as it also had syringes, foil, an elastic band, lighters, and cotton pieces, leading officers to believe the blue pill was fentanyl. Thorne also provided consent to search his person. He was searched and no contraband was located. Newell and Thorne were released. Kirkland was arrested on her warrant.

22. On July 5, 2022, I reviewed Thorne’s criminal history. I observed that Thorne has been charged with nine felonies and convicted of four. Thorne’s criminal convictions included burglary, forgery, violation of a protective order, and criminal endangerment, among others. I also observed that Thorne was charged with, but not convicted of, Possession of Dangerous Drugs with Intent to Distribute and Assault with a Weapon.

23. On July 5, 2022, FBI Task Force Officer (TFO) Stoll provided me more details regarding the officer safety alerts attached to Thorne. TFO Stoll advised Thorne was carrying a Smith and Wesson .40 caliber pistol while he was a prohibited possessor in 2014. Additionally, Thorne was known to carry a large

fixed-blade knife between his car seats and a hidden handcuff key on his person.

Thorne was noted to be anti-law enforcement.

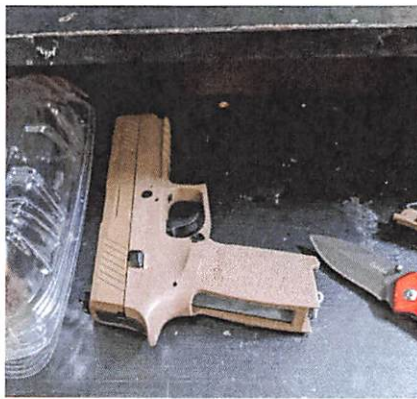
24. On July 6, 2022, Jessica, Operations Supervisor at Glacier Bank, contacted Flathead County Sheriff's Office to report that Leonard Catterlin was attempting to cash a stolen check at Evergreen Glacier Bank drive up and was seated in a vehicle. Officers arrived and located the suspect vehicle. Deputy Toavs made contact with the driver, Chad Thorne, who appeared surprised and did not know what was occurring. Deputy Kammerzell made phone contact with Catterlin, who stated he recently finished a remodel job and had been paid with the check for \$740.00 by the owner. Catterlin was unable to provide a name for the person he claimed he had done work for or any contact numbers for this person. Deputies spoke with Jessica, who stated the check Catterlin was trying to cash was for a closed account and that the account had been closed due to the checks for it being stolen. Jessica stated she verified the account was closed and contacted the former account owner's family, who verified that the check had not been written by anyone authorized to do so. Signatures were also compared, which did not appear to match that of the former account owner. Deputy McGauley attempted to contact the person named on the check, Xiong Zheng. He reached Xiong's son, who stated Xiong did not speak English. Deputy McGauley was able to determine from Xiong's son that no one had written a check to Catterlin.

25. At approximately 5:45 a.m. on July 13, 2022, FBI agents served a federal search warrant at 47 Meadowlark Drive, Kalispell, Montana, 59901. When agents contacted Thorne as he was exiting a shed in the backyard of the residence, Thorne raised his hands in the air but approached agents in an aggressive manner. Agents continued to give Thorne commands and threw a flash bang near Thorne's feet. Thorne continued to approach agents in an aggressive manner for a short time, but then ultimately complied with agents' commands and was taken into custody a short time later.

26. At approximately 5:55 a.m., Flathead County Sheriff's Office Detective McConnell and I attempted to interview Thorne in my government vehicle. Thorne exercised his right to legal representation and the attempted interview was concluded.

27. At the time of the drafting of this affidavit, the search of 47 Meadowlark Drive, Kalispell, Montana, was not complete. Agents had conducted a preliminary search of the shed that Thorne exited from and observed the following in the shed:

- a. "Sig Sauer" pellet gun;



- b. Various ammunition, including calibers 45 Colt, 45 Auto, and 9 millimeter;



- c. Baggie of suspected methamphetamine;



- d. Two digital scales;



e. Identification cards for persons other than Thorne;



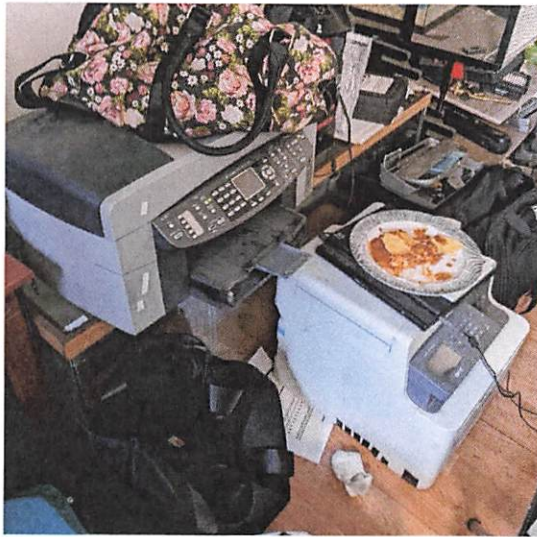
f. Checkbook for the account of a person other than Thorne;



g. Pack of blank business checks;



h. Laptop Computer and two printers;




28. On the back porch of the main residence, agents observed an assault-rifle style pellet gun.



29. Based on the foregoing, I submit that there is probable cause to believe that between January 15, 2021, and present, Chad Thorne committed multiple violations of 18 U.S.C. § 1343 and 1028a, Wire Fraud and Aggravated Identity Theft, 18 U.S.C. § 1344, Bank Fraud, and 21 U.S.C. § 841(a)(1) and § 846, Conspiracy and Possession with Intent to Distribute a Controlled Substance.

Respectfully submitted,



Trevor Hare, Affiant
Special Agent, FBI

SUBSCRIBED and SWORN before me this 13th day of July, 2022.



Kathleen L. DeSoto
United States Magistrate Judge